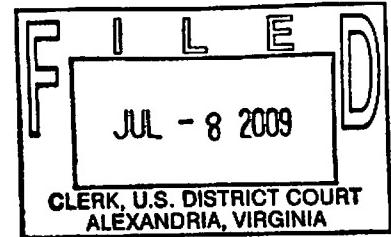


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division



MAD BOMBER COMPANY )

and )

R. BRENT REYNOLDS )

Plaintiffs, )

v. )

CNF MARKETING, INC. )

and )

FUR HAT WORLD )

Defendants. )

) No.1:09-cv-00475-GBL-IDD

) CONSENT JUDGMENT

The Plaintiffs, Mad Bomber Company and R. Brent Reynolds ("Plaintiffs") having filed a complaint in this action alleging, among other things, that CNF Marketing, Inc. and Fur Hat World ("Defendants") have infringed its trademarks and committed unfair competition;

Defendants have answered the complaint raising defenses, including, but not limited to, first sale doctrine and fair use. Defendants also filed a counterclaim alleging that the BOMBER trademark has become generic for "hats;"

Plaintiff and Defendant having compromised their claims, now desire to settle the controversy between them, and they request entry of the following Stipulation of Facts and Consent Judgment and Permanent Injunction:

NOW THEREFORE, based on consideration of the pleadings and exhibits, this Court accepts and approves the requests of the parties and finds and orders as follows:

STIPULATED FACTS

1. This Court has jurisdiction over the subject matter and over the parties to this action pursuant to 15 U.S.C. § 1121, 28 U.S.C. § 1331 and 1338(a) & (b).

2. Plaintiff R. Brent Reynolds is the owner of U.S. Trademark Registration Numbers 1,424,002 MAD BOMBER, Reg. No. 2,000,494 BOMBER, Reg. No. 1,945,915 POLAR BOMBER, Reg. No. 1,951,329 BLIZZARD BOMBER, Reg. No. 1,949,143 LIL' BLIZZARD BOMBER, Reg. No. 1,945,918 CURLY BOMBER and Reg. No. 1,949,139 LIL' MAD BOMBER, (the "Registered Trademarks") and such registrations are valid.

3. Certain use of the MAD BOMBER and BOMBER marks by Defendants in the sale, offering for sale or advertising of headwear at the websites www.furhatworld.com or www.sheepskinworld.com or elsewhere infringes the Registered Trademarks, and such sale, offering for sale or advertising constitutes unfair competition and false advertising.

CONSENT JUDGMENT AND PERMANENT INJUNCTION

IT IS THEREFORE ORDERED that judgment as to all counts in favor of Plaintiffs is entered by consent, and that Defendants CNF Marketing, Inc. and Fur Hat World and their principals, officers, members, agents, servants, employees, attorneys, and those persons under their control or in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, are hereby enjoined and permanently restrained from:

1. (i) selling, offering for sale, advertising or distributing any headwear using the Registered Trademarks, or any colorable imitations thereof, which causes a likelihood of confusion or mistake and;
  - (ii) falsely suggesting an affiliation or connection between Plaintiffs and Defendants or their respective products;
  - (iii) assisting, aiding, or abetting any other person or entity in engaging in or performing any of the activities described in paragraphs (i) (ii) above.
2. Defendants waive all rights of appeal from this Consent Judgment.

ORDERED that this judgment constitutes a final judgment as to all claims asserted in this action by Plaintiffs against Defendants, and the parties stipulate to dismissal of Defendants' counterclaims. However, if Plaintiffs bring a further action against Defendants (or any of them) for infringement of the Registered Trademarks, Defendants can reassert the defenses and counterclaims set forth in its Answer to Complaint and Counterclaim . The parties shall pay their respective attorneys' fees and costs.

ORDERED that this Court retains jurisdiction for the purposes of making any further orders necessary or proper for the construction, modification or the enforcement of the Consent Judgment and Permanent Injunction.

ENTERED:

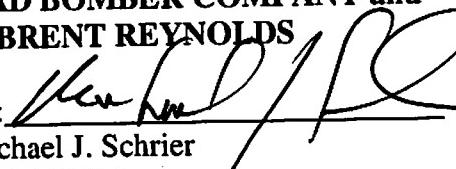
Dated this 8<sup>th</sup> day of July, 2009

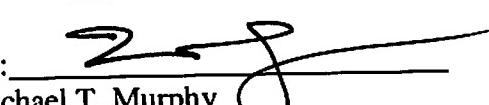
/s/  
Gerald Bruce Lee  
United States District Judge  
Hon. Gerald Bruce Lee  
United States District Court Judge

APPROVED AND CONSENTED TO:

**MAD BOMBER COMPANY and  
R. BRENT REYNOLDS**

Dated 7/7/09

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-and-

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**CNF MARKETING, INC. and FUR HAT WORLD**

Dated 7/7/09

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